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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ARGO TURBOSERVE CORPORATION,

Plaintiff,

versus

DEAN ANGELLE AND DENISE ANGELLE,

Defendants.

**CASE NO. 07 CV 8410 (RMB)
(GWG)**

**DECLARATION OF
ERIC MICHAEL LIDDICK IN
SUPPORT OF DEFENDANTS'
MOTION TO COMPEL
DISCOVERY RESPONSES
FROM PLAINTIFF**

ERIC MICHAEL LIDDICK declares as follows:

1. I am a member of Jones, Walker, Waechter, Poitevent, Carrère & Denègre, L.L.P., attorneys for Defendants, Dean Angelle and Denise Angelle.
2. I submit this declaration in support of Defendants' Motion to Compel Discovery Responses from Plaintiff, Argo Turboserve Corporation.
3. The following documents are attached hereto and made a part of this Motion:

Exhibit “1” – Pertinent portions of the deposition of Walter Simson on February 14, 2008.

Exhibit “2” – Post-Closing Letter dated March 8, 2006.

Exhibit “3” – Promissory Note executed by D&D Pipe and Rentals, Inc. in favor of John Calicchio in the amount of \$1,500,000 dated February 15, 2006.

Exhibit “4” – Signature page of Subordination Agreement dated March, 2006 and signed by John Calicchio in favor of Wells Fargo Bank, National Association.

Exhibit “5” – E-mail string from Paul Perialas, former CFO of Argo Turboserve Corporation, to Pamela Bialkin of Deloitte & Touche, LLP dated May 26, 2006.

Exhibit “6” – Memorandum from Clyde Keaton, CEO of Argo Turboserve Corporation, to the Members of the Board dated July 11, 2006 (*attached at Plaintiff’s counsel’s request to courtesy copy only*)

Exhibit “7” – Equity Appraisal Services Intangible Valuation Discussion.

Exhibit “8” – Pertinent portions of the deposition of Wayne Ackerman on February 15, 2008.

Exhibit “9” – E-mail from Paul Perialas, former CFO for Argo Turboserve Corporation, to Joseph Mullen of Wells Fargo dated August 17, 2006.

Exhibit “10” – Unredacted portion of Independent Auditor’s Report.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in New Orleans, Louisiana, this 22nd day of April, 2008.

/s/ Eric Michael Liddick

Eric Michael Liddick (LA Bar No. 31237)
(Admitted *Pro Hac Vice*)